

Exhibit 4

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 - - -

4 THE MIDDLE EAST FORUM, : CIVIL ACTION NO.
5 : 2:19-cv-05697-JS

6 Plaintiff, :
7 vs. :

8 LISA REYNOLDS-BARBOUNIS, :
9 :
10 Defendant. :

11 - - -

12 Videotaped deposition of
13 DANIEL PIPES, taken via Zoom Conference on Thursday,
14 September 2, 2021, commencing at approximately 12:08
15 p.m., before Kori Skinner, Professional Court Reporter -
16 Notary Public, there being present:

17 **CONFIDENTIAL - ATTORNEY'S EYES ONLY**
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21
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23
24

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Q Okay. So is that the only way that you can think
13 of that -- that the Middle East Forum was affected
14 because you hired a lawyer to find out if you were
15 affected?

16 A No. We hired experts to look at the economic
17 damage that your client caused us. I'm not in a
18 position to explain that to you. She stole our
19 information, I know that. The impact of the stealing of
20 that information I cannot tell you.

21 Q Okay. You said the impact. You don't know what
22 the impact was, is that what you just said?

23 A I told you that that is not my domain.

24 Q Okay.

1 A We have an expert who is investigating this for us.

2 Q Who's the expert that you're talking about?

3 A You'll have to ask Mr. Roman.

4 Q Do you know who it is?

5 A I have seen the name, I can't tell you the name.

6 Q Well, what kind of expert are they?

7 A Now that I think about it, her name is Stout.

8 She's an expert on economic damages in cases like this,

9 and she's reviewing the materials.

10 Q An expert on economic damages?

11 A I believe so.

12 Q What's her name?

13 A Stout.

14 Q Stout?

15 A S-T-O-U-T.

16 Q Is that Ms. Stout or Mr. Stout?

17 A Ms., I believe.

18 Q When was she retained?

19 A Some weeks ago.

20 Q Sorry?

21 A Some weeks ago.

22 Q Okay. So you retained her in -- sometime around

23 August of 2021?

24 A I believe so.

1 CERTIFICATION

2
3 I hereby certify that the proceedings and
4 evidence are contained fully and accurately in the
5 stenographic notes taken by me upon the foregoing matter
6 and that this is a correct transcript of the same.
7
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9

10 *Kori Skinner*
11 _____

12 Kori Skinner

13 Court Reporter-Notary Public
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